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13 Attorneys for Plaintiff
14 CHRISTINE DOUGHERTY

15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 CHRISTINE DOUGHERTY,) NO. C 07-01140 MHP
18 Plaintiff,)
19 v.) **PLAINTIFF'S INITIAL
20 AMCO INSURANCE COMPANY) DISCLOSURES**
21 and DOES ONE through) [Fed. Rule Cov. Proc. 26(a)(1)]
22 TWENTY, Inclusive,)
23 Defendants.)
24 _____)
25

26 Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Christine
Dougherty hereby makes her initial disclosures. Plaintiff makes these
disclosures based on her present knowledge, information, and belief,
formed after an inquiry that is reasonable under the circumstances. To the
best of plaintiff's and her counsel's knowledge, this disclosure is complete

1
2 and correct at this time. Plaintiff reserves the right to amend or supplement
3 this disclosure.

4 **A. Rule 26(a)(1)(A):** The name, address and telephone number of
5 each individual likely to have discoverable information relevant to plaintiff's
6 claims are as follows:

- 7 1) Christine Dougherty
8 2 Sinaloa Court
Novato, CA 94947
(415) 897-1101
- 9 2) Malcolm Rayburn
10 2 Sinaloa Court
Novato, CA 94947
(415) 897-1101
- 11 3) Glen Osmidoff
12 140 San Carlos Way
Novato, CA 94947
(415) 898-9261
- 13 4) Darrell Wayne Anderson
14 2006 Mora, Apt. 10
Calistoga, CA 94515
(707) 942-8141
- 15 5) B. Welch
16 California Highway Patrol
53 San Clemente Drive
Corte Madera, CA 94925
(415) 924-1100
- 17 6) Gina Todd
18 USAA Casualty Insurance Company
P.O. Box 15506
Sacramento, CA 95852
(800) 531-8222
- 19 7) Jeff Mangone
20 AMCO Insurance Company
21 Pacific Coast Regional Office
2301 Circadian Way
P.O. Box 849
Santa Rosa, CA 95402-0849
(800) 552-2437

- 1 8) Julie Nickell
2 AMCO Insurance Company
3 Pacific Coast Regional Office
4 2301 Circadian Way
5 P.O. Box 849
6 Santa Rosa, CA 95402-0849
7 (800) 552-2437
- 8 9) Linda Howard
9 AMCO Insurance Company
10 Pacific Coast Regional Office
11 2301 Circadian Way
12 P.O. Box 849
13 Santa Rosa, CA 95402-0849
14 (800) 552-2437
- 15 10) Ernest H. Sponzilli, M.D.
16 Mt. Tam Orthopedics
17 1341 South Eliseo Drive
18 Greenbrae, CA 94904
19 (415) 924-8900
- 20 11) Paula Abdaub, R.N.
21 Mt. Tam Orthopedics
22 1341 South Eliseo Drive
23 Greenbrae, CA 94904
24 (415) 924-8900
- 25 12) Mark S. Lawler, M.D.
26 Marin Orthopedic & Sports Medicine
27 4000 Civic Drive, Suite 205
28 San Rafael, CA 94903-5233
29 (415) 492-1600
- 30 13) Charles Peri, M.D.
31 Novato Acupuncture & Herb Clinic
32 1531-E South Novato Boulevard
33 Novato, CA 94949
34 (415) 897-4678
- 35 14) Linda Kozitza-Pepper, Ph.D.
36 3 Hamilton Landing, Suite 230
37 Novato, CA 94949
38 (415) 883-8332
- 39 15) Michele Cohen, M.P.T.
40 Novato Back Care and Sports Rehabilitation
41 505-B San Marin Drive, Suite 180
42 Novato, CA 94945
43 (415) 898-1311

- 1 16) Renton Rolph, Esq.
2 Law Offices of Justin D. James
3 One Front Street, Suite 1250
4 San Francisco, CA 94111
5 (415) 837-3820
- 6 17) Vincent B. McLorg, Esq.
7 Law Office of Vincent B. McLorg
8 185 Prospect Avenue
9 San Anselmo, CA 94960
10 (415) 686-1485
- 11 18) The Honorable Alfred Chiantelli, Judge (ret.)
12 ADR Services, Inc.
13 50 Fremont Street, Suite 2110
14 San Francisco, CA 94105
15 (415) 772-0900

10 **B. Rule 26(a)(1)(B):** The following documents are in the possession,
11 custody or control of defendant which plaintiff may use to support her
12 claims:

- 13 1) Amco Insurance Company Policy No. PPA 0008899321-1
14 (Bates-stamped as pages 0200001-020063, with "Copy
15 Certification by Custodian of Records" page).
- 16 2) Non-Privileged portions of AMCO's claim file diary notes
17 regarding claim no. 84M33976 (Bates-stamped as pages
18 010082-010124).
- 19 3) Non-privileged portions of AMCO's claim file regarding claim no.
20 84M33976 (Bates-stamped as pages 010001-010081, 010125-
21 011278).
- 22 4) AMCO's privilege log.
- 23 5) Transcript of deposition of Christine Dougherty on August 9,
24 2002.
- 25 6) Transcript of deposition of Malcolm Rayburn on August 9, 2002.
- 26 7) Transcript of deposition of Ernest H. Sponzilli, M.D. on

1 November 26, 2002 and Exhibits thereto.

- 2 8) Transcript of deposition of Christine Dougherty on June 16,
3 2005 and Exhibits thereto.
- 4 9) Transcript of deposition of Glen Robert Osmidoff on August 31,
5 2005 and Exhibits thereto.
- 6 10) Plaintiff's medical expense documents previously produced to
7 defendant as bates-stamped nos. 000001 - 000083.
- 8 11) Traffic Collision Report No. NP0100188T regarding the multi-
9 vehicle accident on April 17, 2001, previously produced to
10 defendant as bates-stamped nos. 000151 - 000157.
- 11 12) Recorded Statement of Christine Dougherty on April 18, 2001
12 taken by Gina Todd of USAA Sacramento, previously produced
13 To defendant as bates-stamped nos. 000158 - 000167.
- 14 13) California Traffic Accident Report dated April 24, 2001 submitted
15 by plaintiff to the California Department of Motor Vehicles and
16 previously produced to defendant as bates-stamped no.
17 000168.
- 18 14) Plaintiff's profit & loss statements previously produced to
19 defendant as bates-stamped nos. 000169 - 000172.
- 20 15) Photographic document of plaintiff's injuries previously produced
21 to defendant as bates-stamped no. 000173.
- 22 16) All correspondence between AMCO Insurance and Stephen M.
23 Murphy / David M. Porter.
- 24 17) Notes of phone communications between AMCO and
25 Stephen M. Murphy.
- 26 18) Arbitration Award dated March 1, 2006 by Hon. Alfred G.
Chiantelli (Ret).

C. Rule 26(a)(1)(C): Plaintiff is seeking (a) general damages for emotional distress, humiliation and mental anguish; (b) lost interest and/or interest incurred on moneys borrowed, increased litigation expenses, increased personal expenses, increased attorneys fees, and other financial losses; and (c) exemplary (punitive) damages, all according to proof. Plaintiff is also seeking reasonable attorneys' fees, costs and expenses of litigation, and prejudgment interest. The calculation of such damages is incomplete at this time, and is dependant on discovery proceedings to ascertain relevant facts in support of such calculation.

D. Rule 26(a)(1)(D): Please refer to insurance policy documents identified under part B above.

Dated: July 5, 2007

LAW OFFICES OF STEPHEN M. MURPHY

By: /s/ Stephen M. Murphy

STEPHEN M. MURPHY
Attorney for Plaintiff